NorthPoint's Written Position on Cooperative Acceptance Testing and Line Sharing Ordering for the August 10, 2000 Telecom Policy Meeting.

COOPERATIVE ACCEPTANCE TESTING

NorthPoint has had the following problems with SBC/Ameritech: (1) SBC/Ameritech not reliably provisioning DSL-capable loops; (2) SBC/Ameritech failing to consistently provide NorthPoint with demarcation information, which is the requisite information regarding where NorthPoint can locate the loops once they have been provisioned by SBC/Ameritech; and (3) SBC/Ameritech prematurely closing out trouble tickets which cause NorthPoint to submit multiple trouble tickets on the same orders. NorthPoint and Ameritech have identified cooperative acceptance testing as a remedy to solve all of these issues. Unfortunately, Ameritech is not yet performing cooperative acceptance testing to our satisfaction: currently, Ameritech does not perform cooperative acceptance testing on most of NorthPoint's orders. Cooperative acceptance testing is the process whereby the ILEC technician turning-up a DSL-capable loop contacts the LOC and the CLEC and the three conduct a joint test to confirm that the loop is working to mutually agreed upon or Commission mandated standards. Acceptance testing is essential if CLECs are to effectively compete in the DSL market. NorthPoint needs demarcation information and a reliably provisioned loop to ensure that its customers know when their DSL is going to be installed in their home or business. Furthermore, NorthPoint needs reliably provisioned loops in a timely manner so that it can compete in the marketplace.

Fortunately, NorthPoint and Ameritech have entered into negotiations but it is not clear whether the agreement is acceptable to both sides. However, the agreement has not yet been reduced to writing. Until it is, NorthPoint respectfully requests that the Commission keep this issue on the open issues list with the understanding and expectation that, as soon as the issue has been resolved, the parties will quickly remove this issue from the open issues list.

LINE SHARING (ORDERING)

Currently, NorthPoint cannot order line shared loops from Ameritech using EDI and, instead, must place orders via FAX. Faxing orders is inefficient, time consuming and costly for both parties. For this reason, both parties are working aggressively toward implementing EDI in the Ameritech region by December 1, 2000. Until then, FAX ordering is the only ordering method available for line shared loops.

NorthPoint is delighted that Ameritech anticipates implementing EDI by December 1, 2000. However, NorthPoint needs reassurance from Ameritech that if EDI is not implemented by that date, NorthPoint will be allowed to continue placing orders via FAX. To prevent NorthPoint from placing FAX orders after December 1, 2000 --regardless of the state of EDI—is unreasonable. EDI is a new and heretofore untested transmission media in the telecommunications wholesale industry. There is no guarantee that the parties will be able to implement EDI by December 1. In the event that the parties cannot implement EDI by that date, NorthPoint should not be prevented from placing orders for line shared loops.

Furthermore, once EDI has been implemented, NorthPoint should still be able to process orders via FAX in cases where the EDI is temporarily unavailable. As stated above, EDI is a new and untested transmission media. There is no guarantee that it will always be up when NorthPoint or Ameritech needs it. NorthPoint must be able to place line sharing orders regardless of whether EDI is up or not.

Finally, NorthPoint does not believe that it should be charged for transmitting orders via FAX until EDI has been implemented. And, even then, NorthPoint should not be charged for transmitting orders in the event that EDI is temporarily unavailable. During those times, NorthPoint has no other option for placing orders for line shared loops. NorthPoint would agree to being charged for placing orders via FAX once EDI is implemented and fully operational. However, NorthPoint should not be penalized because EDI has not yet been implemented or because EDI is down.

In sum, NorthPoint wants to be able to effectively compete in the emerging services market. NorthPoint will only be able to do so if it is able to order line shared loops regardless of when EDI is implemented and if NorthPoint isn't charged for placing its line sharing orders in the only manner available to it.